

PUBLIC INTEREST

— LEGAL FOUNDATION —

June 5, 2015

Federal Election Commission
Office of Complainants Examination
and Legal Administration
Attn: Frankie Hampton, Paralegal
999 E Street NW
Washington, DC 20463

**Re: MUR 6740
National Organization for Marriage and
Brian Brown**

Dear Ms. Hampton:

We have been retained to represent the National Organization for Marriage ("NOM") and Mr. Brian Brown (collectively "Respondents") in MUR 6740. The Statements of Designation of Counsel were provided previously provided with Respondents' initial response dated July 11, 2013. On September 11, 2013, we provided a supplemental response in light of a supplemental complaint that was filed on July 29, 2013. On May 6, 2015, we received the second supplemental complaint submitted to you by the complainant on April 16, 2015. Please accept this second supplemental response on behalf of both NOM and Mr. Brown.

No action should be taken against NOM or Mr. Brown in this matter. Neither the original complaint filed two years ago, nor the supplemental complaint, nor the second supplemental complaint submitted in April of this year contain any evidence or substantiation whatsoever to support the allegation that NOM or Mr. Brown have violated the Federal Election Campaign Act of 1971 in any way. The complaints do not recite any facts that describe a violation of a statute or regulation over which the Commission has jurisdiction. 11 C.F.R. § 111.4(d)(4). The complaint, supplemental complaint, and second supplemental complaint are frivolous and should be dismissed.

Responses to Supplemental Allegations

Respondents will not address again the allegations and information submitted in the original and supplemental complaints filed in 2013 as they have been addressed in previous responses.

The second supplemental complaint dated April 2, 2015, adds nothing at all related to NOM or Mr. Brown. NOM is only mentioned as having used the same attorney as one of the other respondents.

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This two-year-old complaint should be dismissed and the FEC should take no further action against NOM or Mr. Brown. By doing so the FEC can reaffirm that the FECA and the complaint process cannot be abused by filing of specious complaints that do nothing more than harass and malign ideological opponents.

Handwritten signature
Joseph A. Vanderhulst